

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

PGI POLYMER, INC.,

Plaintiff,

v.

CHURCH & DWIGHT CO., INC., ET AL.

Defendants

Civil Action No.:
3:15-CV-0214 (FDW)(DSC)

**STIPULATION TO TAKE DEPOSITIONS
OUTSIDE OF THE DISCOVERY PERIOD**

Pursuant to Paragraph 1(b) of the Case Management Plan [D.E. 59] and Fed. R. Civ. P. 29, the Parties Stipulate that the following depositions shall be taken outside of the discovery period, and during the month of February, 2016:

- Karmin Industries (Rule 30(b)(6))
- Karmin Group (Rule 30(b)(6))
- Church & Dwight, Co., Inc.. (Rule 30(b)(6))
- PGI Polymer, Inc. (Rule 30(b)(6))
- Clorox Company (Rule 30(b)(6))(third party subpoena)
- Rick Jezzi (Defendants' expert)
- George Mantis (Defendants' expert)
- Basil Englis (Plaintiff's expert)
- Any other rebuttal expert witnesses disclosed by the parties.

January 29, 2016

Stipulated, Agreed and
Respectfully Submitted,

s/Charles Landrum

Jason M. Sneed, Esq. (NC Bar No. 29593)
Charles Landram, Esq., (admitted *pro hac vice*)
Neal B. Hayes, Esq. (admitted *pro hac vice*)
SNEED PLLC
610 Jetton St., Suite 120-107
Davidson, North Carolina, 28036
Tel: (844) 763-3347
Email: JSneed@SneedLegal.com
CLandrum@SneedLegal.com
NHayes@SneedLegal.com
Attorneys for Plaintiff

Stipulated, Agreed and
Respectfully Submitted,

s/ Jeffrey A. Lindenbaum

Jeffrey A. Lindenbaum, Esq. (admitted *pro hac vice*)
Collen IP
The Holyoke-Manhattan Building
80 South Highland Ave.
Ossining-on-Hudson, NY 10562
jlindenbaum@collenip.com

Attorneys for Defendants / Counterclaimants

CERTIFICATE OF FILING AND SERVICE

I, Matthew J. Ladenheim hereby certify that I caused a true and correct copy of the foregoing STIPULATION to be filed with the Court using its ECF system, which will send notification to all counsel of record.

Respectfully submitted,

This the 29th day of January, 2016

TREGO, HINES & LADENHIEM, PLLC

/s/ Matthew J. Ladenheim

Matthew J. Ladenheim

NC State Bar No. 29309

TREGO HINES & LADENHEIM, PLLC

9300 Harris Corners Parkway Suite 210

Charlotte, North Carolina 28269

Telephone: 704-599-8911

Facsimile: 704-599-8719

E-mail: mjl@thlip.com

Counsel for Defendants/Counterclaim Plaintiffs